Case 1:02-cv-00648-WDQ Document 177-15 Filed 03/09/2007 Page 1 of 9

EXHIBIT K

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND NORTHERN DIVISION

EQUAL EMPLOYMENT : CIVIL NO.

OPPORTUNITY COMMISSION:

AND

KATHY C. KOCH

INTERVENOR/PLAINTIFF:

V

L.A. WEIGHT LOSS

CENTERS, INC.

DEFENDANT : WDQ-02-CV-648

APRIL 1, 2005

ORAL DEPOSITION OF CHRISTIANE
BURNARD, TAKEN PURSUANT TO NOTICE, WAS
HELD AT THE LAW OFFICES OF THE EQUAL
EMPLOYMENT OPPORTUNITY COMMISSION, THE
BOURSE BUILDING, 4TH FLOOR, PHILADELPHIA,
PA, BEGINNING AT 10:00 A.M., ON THE ABOVE
DATE, BEFORE NANCY D. RONAYNE, A
PROFESSIONAL COURT REPORTER AND NOTARY
PUBLIC IN THE COMMONWEALTH OF
PENNSYLVANIA.

ESQUIRE DEPOSITION SERVICES
15TH FLOOR
1880 JOHN F. KENNEDY BOULEVARD
PHILADELPHIA, PENNSYLVANIA 19103
(215) 988-9191

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23 IL THE WAS CIVER THE TWI KESSION			22	RESIGNING?
	22			
1	23	ľ	23	A. HE WAS UNDER THE IMPRESSION

	Page 30		Page 32				
1	STATEMENT?	1	A. I WOULD DO PRIMARY				
2	A. I HAVE I HAVE RECORDED	2					
3	PERHAPS A SITUATION IN A CENTER, PERHAPS	3	AVAILABLE TO DO IT.				
4		4					
5		5	SUPERVISOR THE ENTIRE TIME YOU WERE A				
б		б	CENTER MANAGER AT ELMIRA?				
7	e. 1211 xeo: next to imeno;	7	A. YES, I DID.				
8		8	Q. WHO WAS THAT AREA				
9		9	SUPERVISOR?				
10		10	A. HILDI ROGERS.				
11		11	Q. DO YOU RECALL HOW MANY TIMES				
12		12					
13	C	13	CENTER MANAGER?				
14	THE ENDING TO THE ELECTRICATION OF THE PROPERTY OF THE PROPERT	14	THE THE THE PERSON OF THE PARTY				
15		1	FOUR.				
16		16	(== == == == == == = = = = = = = = = =				
17	6. 201001ECHIC	17	THOSE CHARDINATED WEIGH MALES!				
18	01.20.	18	A. I DON'T BELIEVE SO.				
19 20	TOTAL TIME TOTAL	19	6. WHEN THESE CHANDING TOR				
21	_ ,	20	THE SEMINATORY OF WERE THESE				
22	6. (15 to the control of the control		CANDIDATES FOR OTHER CENTERS AS WELL?				
l .	100 STIMETED WORKERIOTE EL WEIGHT	22					
24	LOSS NOVEMBER 19, 1997, WHAT WAS YOUR FIRST POSITION AT LA WEIGHT LOSS?	23	Q. SO YOU CONDUCTED THE FIRST				
2 1	THEST TOSTITON AT LA WEIGHT LOSS!	24	INTERVIEW?				
	Page 31		Page 33				
1	A. SALES COUNSELOR.	1	A. RIGHT.				
2	Q. WHICH CENTER?	2	Q. DID YOU HAVE ANY OTHER				
3	A. BINGHAMTON, NEW YORK.	3	PARTICIPATION IN THE PROCESS OTHER THAN				
4	Q. HOW LONG WERE YOU A SALES	4	CONDUCTING THE FIRST INTERVIEW WHILE YOU				
5	COUNSELOR AT BINGHAMTON, NEW YORK?	5	WERE CENTER MANAGER AT ELMIRA?				
6	A. APPROXIMATELY NINE MONTHS.	6	A. I DON'T BELIEVE SO.				
7	Q. IS IT CORRECT TO SAY THAT AS	7	Q. ONCE YOU CONDUCTED THE				
8	A SALES COUNSELOR YOU HAD NO	8	INTERVIEW WHAT WOULD YOU DO?				
9	PARTICIPATION IN THE HIRING PROCESS?	9	A. I WOULD CALL MY SUPERVISOR				
10	A. CORRECT.	10	AND LET HER KNOW IF I LIKED THE PERSON OR				
11	Q. WHAT WAS YOUR NEXT POSITION?	1	DIDN'T LIKE THEM.				
12	A. CENTER MANAGER.	12	Q. DO YOU KNOW WHAT WOULD				
13	Q. WHICH CENTER?		HAPPEN NEXT?				
14 15	A. ELMIRA, NEW YORK.	14	A. IF I LIKED THE PERSON AND				
16	Q. WHEN WAS THAT? A. APPROXIMATELY ILLY OF '98	15	SHE WOULD ASK ME QUESTIONS ON WHY I LIKED				
17	THE THE PROPERTY OF THE PROPER		THE PERSON THEN MY SUPERVISOR WOULD				
18	Q. HOW LONG WERE YOUR CENTER MANAGER AT ELMIRA?		EITHER DO A SECOND INTERVIEW WHEN SHE				
19	A. ABOUT A YEAR AND A HALF.	1 C	CAME TO TOWN OR SHE WOULD OFFER THE				
20	Q. WHILE YOU WERE A CENTER		POSITION.				
	MANAGER AT ELMIRA DID YOU HAVE ANY ROLE	20	Q. DO YOU KNOW THIS FROM				
22	IN THE HIRING PROCESS?	21	DISCUSSION WITH MS. ROGERS, THAT THAT'S				
23	A. VERY MINOR.	23	WHAT WOULD HAPPEN NEXT?				
24	Q. WHAT WAS THAT ROLE?		A. WELL, YES, BECAUSE THEN THE PERSON WOULD APPEAR IN MY CENTER AS A				
tarrers.		en I	TENDOT WOOLD ATTEMA IN MIT CENTER AS A				
	Businedia						

		_	
	Page 42		Page 44
1 1	C = 0 100 IA (O II) WILLII HER	1	
2	POSITION WAS AT THE TIME?	2	6. SO LOGIETON H MATORIE EEDE
3	A. SHE WAS A TRAINER.	3	WIE HAVE DECIDION:
4	Q. DO YOU KNOW IF SHE'S STILL	4	THE POSSOCIATION
5	WITH THE COMPANY?	5	Q. 20 100 E O WINT THE NATURE
7	A. NO, SHE'S NOT.	6	OI INSCENT OF PROPERTY WAS:
<u>'</u>	Q. DO YOU KNOW ANYTHING ABOUT	7	12 11221 BOTH MITERA IE WED ME.
9	THE CIRCUMSTANCES OF HER DEPARTURE FROM THE COMPANY?	8	Q. INDUCEDED OF IMAIN
10		9	THE PROPERCY OF THE ACTION OF THOSE
11		10	TITEL TENTO
12		11 12	TOOLLEDO.
13		1	C W DOME WELL TOO MULK
14	_	14	SUPERVISOR IN ALBANY?
15		1	12 1 WIR T WHILKOMOTED IO
16			THE POSITION IN JANUARY OF 2000 AND THEN
17	A. WELL, I WAS OPENING THE	17	I BELIEVE I WAS PROMOTED TO THE REGIONAL IN OCTOBER OR NOVEMBER OF THAT SAME YEAR.
18		18	Q. AS THE AREA SUPERVISOR WERE
19			YOU INVOLVED IN THE HIRING PROCESS?
20		20	
21		21	
22	AND CLIFTON PARK. THEN TO FOLLOW TROY.	1 .	INVOLVEMENT?
23	NEW YORK AND PITSFIELD, MASSACHUSETTS.	23	
24	Q. CAN YOU TELL ME WHAT TIME	24	AS FAR AS HIRING?
	Page 43		Page 45
1	FRAME ELAPSED FROM THE OPENING OF ALBANY,	1	Q. YES.
2	SCHENECTADY AND CLIFTON TO THE OPENING OF	2	A. I WOULD GET THE LEADS OFF OF
3	TROY AND PITSFIELD?	3	MY LEAD LINE, I WOULD PHONE SCREEN THEM,
4	A. YES, I THINK I CAN GIVE YOU	4	AND THEN BASED ON HOW MANY OR WHOEVER
5	AN APPROXIMATE. WE OPENED THE FIRST	5	APPLIED WE WOULD SCREEN THEM. I WOULD
6	THREE IN THE WEEK OF MEMORIAL DAY 2000,	6	SCREEN THEM OR MY REGIONAL MANAGER WOULD
7	AND THEN TROY OPENED THAT JULY AND	7	SCREEN THEM AND THEN INVITE THEM IN FOR
8	PITSFIELD OPENED IN SEPTEMBER ALL OF	8	INTERVIEWS.
9	2000.	9	Q. AND THEN YOU WOULD CONDUCT
10	Q. WHEN WERE YOU PROMOTED TO	10	THE INTERVIEW?
11	AREA SUPERVISOR?	11	A. YES.
12	A. THE BEGINNING OF THE YEAR,	12	Q. DID YOU MAKE THE DECISION
13	JANUARY.	13	WHETHER TO HIRE THE PERSON?
14	Q. 2000?	14	A. MYSELF AND MY REGIONAL
15	A. 2000.	15	MANAGER.
16	Q. DO YOU KNOW WHO MADE THAT	16	Q. DID YOU HAVE THE SAME
	DECISION TO PROMOTE YOU?		REGIONAL THE ENTIRE TIME THAT YOU WERE
18	A. VAHAN KARIAN.		AREA SUPERVISOR?
19	Q. DO YOU KNOW WHY HE WAS	19	A. YES.
		20	Q. WHO WAS IT FIRST?
21 22		21	A. LIZA TYGART.
	DIGINE AND	22	Q. FOR WHAT POSITIONS DID YOU
	AND I WILL GOOD IS TO DO A COLUMN TO THE COL		DO HIRING?
	THE CORTO TO DE WIO VITA TO THIS NEW	24	A. COUNSELOR, ASSISTANT MANAGER

CHRISTIANE BURNARD Page 66 1 OPENING, I WANT TO FILL THAT OPENING, POSSIBLE WE PROMOTE FROM WITHIN. IF IT'S IT'S FOR A COUNSELOR JOB, HOW DO I KNOW A CENTER COUNSELOR POSITION WE WOULD RUN WHETHER OR NOT I HAVE TO CONSULT WITH YOU 3 AN AD IN THE PAPER. 4 OR INVOLVE YOU IN THE PROCESS? Q. WERE YOU USING ELECTRONIC OR 5 A. IT'S MOSTLY WE HAVE COMPUTERIZED RECRUITING SERVICES WHEN YOU б DAY-TO-DAY CONVERSATIONS AND I WOULD SAY WERE A REGIONAL MANAGER? 7 HOW ARE YOUR INTERVIEWS TODAY; GREAT, I 7 A. I DO NOT BELIEVE SO. FOUND A COUPLE REALLY GOOD PEOPLE I'D 8 Q. WHAT IF IT WAS AN ASSISTANT LIKE TO MAKE AN OFFER. OKAY. OR IF IT 9 9 MANAGER, WHAT WOULD BE THE FIRST STEP? 10 WAS ONE I'M NOT REALLY SURE COULD YOU DO 10 A. SAME THING, LOOK FROM 11 A PHONE SCREEN OR WHEN WILL YOU BE IN WITHIN, IF WE HAVE A REAL STRONG 12 TOWN. COUNSELOR THAT WE COULD PROMOTE, THAT 13 Q. WERE THE AREA SUPERVISORS 13 WOULD BE THE FIRST. 14 REQUIRED TO CHECK WITH YOU BEFORE THEY 14 Q. I ASSUME LOOK FROM WITHIN MADE A DECISION TO HIRE A COUNSELOR? REALLY WOULDN'T APPLY TO A MEDICAL 16 A. I DON'T KNOW IF REQUIRED, I 1.6 ASSISTANT? 17 DON'T KNOW IF IT WAS REQUIRED. WOULD 17 A. NOT NECESSARILY. SOMEONE BE IN TROUBLE IF THEY MADE AN 18 Q. IT WOULD? OFFER WITHOUT MY PERMISSION, NO. 19 A. YES. WE'VE PROMOTED MEDICAL 20 Q. DO YOU KNOW OF ANY INSTANCES 20 ASSISTANTS BECAUSE THEY DO MANY OF THE 21 WHERE THAT HAPPENED? SAME DUTIES AS A SALES COUNSELOR, THE 22 A. NO. MAJORITY OF THEIR TIME IS APPROXIMATELY 23 Q. HOW WOULD YOU CHARACTERIZE 23 FIVE TO 10 PERCENT OF THEIR WORKWEEK. 24 THE FREQUENCY OF YOUR INTERACTIONS WITH Q. BUT IF YOU WERE LOOKING TO 24 Page 67 YOUR AREA SUPERVISORS ABOUT THEIR HIRING **ACTIVITIES?** NEED SOMEBODY TO BE CERTIFIED? 3 A. WELL, WE'RE IN CONSTANT 3 A. YES, FOR THAT POSITION 4 COMMUNICATION. AREA SUPERVISOR AND ABSOLUTELY. YOU COULD ONLY HIRE A REGIONALS SPEAK TWO, THREE, FOUR TIMES A MEDICAL ASSISTANT FOR THAT BUT YOU COULD

- DAY, SO IF THERE WAS AN OPEN HOUSE OR
- SOMETHING WHERE THEY WERE SET UP TO DO
- INTERVIEWS WE WOULD COMMUNICATE HOW THEY
- 9 WENT AND -
- TΩ Q. WHO AS A REGIONAL MANAGER.
- 11 I'M TALKING ABOUT THAT TIME PERIOD, CAN
- 12 YOU DESCRIBE FOR ME HOW THE PROCESS OF
- 13 HIRING WORKED, YOU HAVE A VACANCY, IT
- 14 NEEDS TO BE FILLED, DURING THAT TIME
- 15 PERIOD WHAT WOULD BE THE FIRST STEP OF
- 16 FILLING A VACANCY?
- 1.7 A. IT WOULD DEPEND ON THE
- 18 POSITION, IF IT WAS LIKE A CENTER MANAGER
- 19 POSITION FIRST WE WOULD LOOK AT OUR
- 20 INTERNAL CANDIDATES, IT'S ALWAYS BEST TO
- 21 PROMOTE FROM WITHIN BECAUSE THE PERSON
- 22 ALREADY UNDERSTANDS WHAT WE DO, HOW TO
- 23 MOTIVATE THE CLIENT, THEY UNDERSTAND THE
- 24 OPERATIONS OF A CENTER. SO WHENEVER

- FILL A VACANCY FOR MEDICAL ASSISTANTS YOU
- PROMOTE A MEDICAL ASSISTANT TO SOMEWHERE
- 7 ELSE.
- 8 Q. SO SOME OTHER POSITION?
- 9 A. YES, CORRECT.
- 10 Q. OKAY. IN THOSE SITUATIONS
- 11 WHERE THERE WAS NO PROMOTION FROM WITHIN
- 12 TO A CENTER MANAGER POSITION, WHAT WAS
- 13 THE FIRST STEP?
- 14 A. WE WOULD CONTACT HR TO LET
- THEM KNOW THAT WE NEEDED AN AD PLACED. 15
- 16 Q. AND THEN WOULD HR PLACE THE
- 17 AD?
- 18 A. YES.
- 19 Q. NOW AFTER -- SETTING ASIDE
- 20 THE INTERNAL PROMOTION, YOU'RE AT THE
- 21 STAGE NOW WHERE AN AD IS BEING PLACED.
- 22 WELL, FIRST OF ALL, IF THERE WAS AN AD
- 23 FOR A COUNSELOR VACANCY WOULD YOU CONTACT
- 24 HR TO PLACE THAT AD TOO?

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Page 69

2 THEM ACTUALLY DOING IT, EITHER WHERE IT 3 COMES OUT IN AN INTERVIEW YOU MIGHT SEE A 4 LITTLE BIT MORE OH, YOU DO OR LIKE SOME 4 DO AREA S	Page 168 EXPERIENCE IS THE HE MEASURING AND WELL,
2 THEM ACTUALLY DOING IT, EITHER WHERE IT 3 COMES OUT IN AN INTERVIEW YOU MIGHT SEE A 4 LITTLE BIT MORE OH, YOU DO OR LIKE SOME 4 DO AREA S	HE MEASURING AND WELL
3 COMES OUT IN AN INTERVIEW YOU MIGHT SEE A 4 LITTLE BIT MORE OH, YOU DO OR LIKE SOME 4 DO AREA S	HE MEASURING AND WELL
4 LITTLE BIT MORE OH, YOU DO OR LIKE SOME 4 DO AREA S	NOT THE WAY
E CODE OF LAW COLOR	
5 SORT OF A REACTION ATTHAT POINT. OR 5 AND MEASURE CT	UPERVISORS WEIGH
6 WILEN VOLUDE MANDE A 100 OFFICE CL	
7 041 4 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	LL DO AT MY
O THOUGHT I THOUGHT TO THE	DO III ON A DATE
C FIED ITTO CO. LOVE TO THE TOTAL THE TOTAL TO THE TOTAL	DO IT ON A DAILY
1.0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
11 A OP DIMENSION OF THE PROPERTY OF THE PROPE	EDI HOOD C DOC
TO A DATE OF THE PROPERTY OF T	ERVISORS DO?
10 IDIDDOGGA STORES	
14 MOUNTAIN TORREST OF A PRINCIPLE O	COUNSEL CLIENTS?
TE WANTED A DOMESTIC TO THE TENT OF THE TE	77 m
1.C. COOD WORD DIVING THE ROLL WITH THE	Y BASIS?
15 DEON'S INICOLEON CONT. D. C.	
2. Q. MIATADO	OUT TRAINERS?
A. WHEN THE	EY'RE NOT IN THE
- CEMBERCOM TIM	I'S A PART OF THEIR JOB
2300141 11011 10 1	O WORK IN A CENTER TO
22 A MAN COMETAGE OFFICE INCOMES TO THE COME OF THE CO	
an aroma rather	
25 BOI ERVISORS DA	Y IN YOUR EXPERIENCE IS
	IG CLIENTS?
Page 167	Page 169
1 FREQUENTLY A CONCERN AMONG MALE 1 A. WELL, WE N	ONE OF US REALLY
2 CANDIDATES THAN FEMALES? 2 HAVE TRUE OFFICE	S AND THE OFFICES THAT WE
A. I THINK IT'S USUALLY A POINT 3 HAVE ARE, WOULD	BE ME, I KNOW MICHELLE
4 OF JUST KIND OF SHOCK IN THE BEGINNING 4 BLUM HAS AN OFFICE	CE IN HER UTICA CENTER,
5 BUT IT'S NOT IT'S, IT'S THEY'RE 5 BUT WE'RE IN A CEN	NTER, EVERY SINGLE DAY.
6 PROFESSIONALS AND THEY'VE WORKED IN SOME 6 TO SAY THE PORTIO	ON OF THEIR DAY I WOULD
7 SORT OF RELATED EXPERIENCE, AGAIN, IF 7 SAY IT WOULD BE N	MAYBE 25 PERCENT TO
8 WE'VE DONE OUR JOB HIRING USUALLY IT'S 8 50 PERCENT, IT DEP	ENDS IF THE CENTER IS
9 NOT A CONCERN AND THEY CAN HANDLE IT 9 FULLY STAFFED OR	IF IT'S JUST A VERY BUSY
10 QUITE WELL AND QUITE PROFESSIONALLY. 10 TIME THEN WE HEL	
11 Q. DO YOU RECALL ANY SPECIFIC 11 Q. AND THESE	ARE AREA
12 INSTANCES OF MALE CANDIDATES WITHDRAWING 12 SUPERVISORS YOU'I	RE TALKING ABOUT?
13 FROM THE PROCESS AFTER BEING TOLD ABOUT 13 A. YES.	
14 THIS ASPECT OF THE JOB OF MEASURING, 14 Q. WELL WHAT	COTHER THAN
15 WEIGHING, DISCUSSING MENSTRUAL CYCLES? 15 COUNSELING CLIEN	IT'S WHAT OTHER DUTIES
16 A. I KNOW OF A FEW THAT HAD BUT 16 DOES AN AREA SUP	
17 I CAN'T GIVE YOU SPECIFICS OF WHO THAT 17 A. THEY WEAR	ALL HATS, WHATEVER
18 PERSON WAS OR WHAT MARKET, SORRY. 18 IS NEEDED. LIKE I S.	
19 Q. OKAY, JUST A FEW? 19 WAS CLEANING BAT	
20 A. YES. 20 WHATEVER NEEDS 7	TO BE DONE. HIRING
21 Q. DO YOU KNOW WHAT POSITIONS 21 COACHING, CONGRA	ATULATING, HELPING TO SET
22 THEY WERE APPLYING FOR? 22 UP FOR AN OPEN HO	OUSE. PERHAPS DEALING
23 A. IT WAS A CENTER, CENTER 23 WITH A CLIENT WHO	D HASN'T BEEN LOSING AT
24 LEVEL, CENTER MANAGER ON DOWN. 24 TWO POUNDS PER W	EEK MAKING ANY

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Page 198 Page 200 DETERMINED OR WAS THAT SOMETHING THAT'S MORE PEOPLE. DO YOU KNOW IF THAT'S EVER BEEN COMMUNICATED TO YOU? BEEN DIFFERENT IN THE PAST, HAVE THERE 3 A. NO, IT'S JUST SOMETHING BEEN ANY FEWER OR ANY MORE CONSIDERATIONS 4 THROUGHOUT THAT PEOPLE WHO DO WELL ON WHEN HIRING AN ASSISTANT MANAGER? YOUR TEAM YOU SEE THEIR PERFORMANCE IT'S 5 A. NO. BECAUSE THEY INITIALLY UNDERSTAND IT AND б Q. SO THAT'S BEEN CONSISTENT GET WHAT YOU DO, THERE'S NO RAMP-UP THROUGHOUT YOUR EXPERIENCE AT THE 7 PERIOD WHERE YOU'RE TEACHING THEM THIS IS COMPANY? WHAT YOU'RE TRYING TO PULL OUT OF THIS, 9 A. I BELIEVE THAT TO BE TRUE. 10 THEY UNDERSTAND IT BECAUSE THEY'VE DONE 10 Q. CENTER MANAGER, YOU KNOW 11 IT IN THE PAST. 11 WHAT'S COMING? 12 Q. DO YOU KNOW OF ANY EMPLOYEES 12 A. YES. 13 WHO HAVE BEEN SUCCESSFUL AT LA WEIGHT 13 Q. SAME PATTERN OF QUESTIONS. 14 LOSS WHO DID NOT HAVE THAT KIND OF 14 IS THERE ANY FACTORS THAT ARE CONSIDERED 15 EXPERIENCE BEFORE THEY CAME TO LA WEIGHT TO BE THE COMPANY LOOKS FOR IN A GOOD 16 LOSS? 16 CANDIDATE FOR CENTER MANAGER? 17 A. SURE. 17 A. CENTER MANAGER IS A VERY 18 Q. YOURSELF? 18 IMPORTANT POSITION BECAUSE YOU ARE 19 A. MYSELF, EXACTLY. 19 RESPONSIBLE FOR EVERYTHING WITHIN THOSE 20 Q. OTHER PEOPLE AS WELL? 20 FOUR WALLS, SO I'M LOOKING FOR A LEADER, 21 A. YES. 21 SOMEBODY THAT DEMONSTRATES LEADERSHIP 22 Q. BECAUSE THE INNER PERSONAL 22 ABILITIES, WHETHER IT WAS IN THEIR PAST 23 ASPECT IS REALLY THE MOST CRITICAL, 23 JOBS, OR THEY CAN, YOU KNOW, ANY 24 CORRECT? 24 RECOMMENDATIONS THAT THEY MIGHT BRING TO Page 199 Page 201 1 A. ABSOLUTELY. THE TABLE AS WELL AS SOMEBODY WHO THAT 2 Q. CURRENTLY IS THERE ANY WHO'S PROFESSIONAL, WHO'S NOT GOING TO 3 **EDUCATIONAL REQUIREMENT FOR ASSISTANT** USE NASTY LANGUAGE IN THE CENTER. 4 MANAGERS? SOMEBODY WHO'S GOING TO BE ABLE TO 5 A. I DON'T BELIEVE SO. CONDUCT THEMSELVES IN AN APPROPRIATE б Q. ANY OTHER FACTORS THAT ARE MANNER WHILE YOU'RE DEALING WITH CLIENTS 7 CONSIDERED IN A GOOD CANDIDATE OTHER THAN EVERY SINGLE DAY. IT'S NOT, YOU KNOW, A WHAT YOU'VE ALREADY TALKED ABOUT? CLOSED OFFICE, IT'S YOU'RE DEALING WITH 9 A. NO. LIKE I SAID, IT'S NOT PEOPLE ALL DAY LONG. YOU MAY SEE 150 TO 10 BASED ON WHO HAS THE MINIMUM TO GET THE 10 200 CLIENTS A DAY AND YOU NEED SOMEBODY JOB WE NEVER HIRE THAT WAY BECAUSE YOU 11 THAT'S GOING TO BE ABLE TO CONTINUE THAT 12 WOULD HAVE FAILING BUSINESSES LEFT AND 12 PACE AND BE CONSTANTLY PROFESSIONAL, 13 RIGHT, WE LOOK TO HIRE SUCCESSFUL PEOPLE 13 MOTIVATING, AS WELL AS ABLE TO DELEGATE 14 AND IT'S ALL COMMUNICATION. AND YOU HAVE 14 AUTHORITY. SOMEONE THAT'S GOING TO BE 15 TO BE A LIKABLE PERSON, YOU HAVE TO BE ABLE TO UNDERSTAND THE SALE, BE ABLE TO 16 SOMEONE THAT CAN CONNECT QUICKLY WITH CLOSE THE SALE, AS WELL AS DEVELOP THEIR 17 SOMEONE THAT YOU DON'T KNOW AND BE ABLE PEOPLE AND BE ABLE TO GIVE THE BEST 17 18 TO JUST START ENGAGING IN A CONVERSATION 18 SERVICE. 19 AND THAT'S, IT'S CRUCIAL. 19 Q. SO WE'RE LOOKING FOR SOMEONE 20 Q. THESE CURRENT THINGS THAT 20 WHO HAS DEMONSTRATED LEADERSHIP ABILITY? 21 YOU'VE DISCUSSED, BASICALLY THE SAME 21 A. YES. 22 FACTORS THAT YOU CONSIDER AS A COUNSELOR 22 Q. SOMEBODY WHO'S PROFESSIONAL 23 BECAUSE PLUS YOU LIKE TO SEE SOME FORM OF 23 IN THEIR APPEARANCE AND IN THEIR DEALINGS 24 COMMISSION SALES AND MANAGEMENT OF ONE OR WITH OTHER PEOPLE, CORRECT?

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Page 202 Page 204 1 A. CORRECT. 1 XEROX? 2 Q. SOMEBODY WHO CAN MOTIVATE 2 A. TECHNICAL, EXACTLY. THAT'S 3 AND SOMEBODY WHO CAN DELEGATE AUTHORITY 3 ABSOLUTELY NOT WHAT WE ARE, I MEAN WE EFFECTIVELY? ONLY JUST GOT COMPUTERS LIKE THREE YEARS 5 A. CORRECT. 5 AGO SO SOMEBODY WHO IS IN THE TECHNICAL 6 Q. SOMEBODY WHO CAN DEVELOP INDUSTRY WOULD PROBABLY GO CRAZY IN OUR 7 PERSONNEL IN THE CENTER, SOMEBODY WHO CAN 7 INDUSTRY. BUT I'M LOOKING FOR SOMEBODY CLOSE A SALE THEMSELVES? 8 THAT IS, WORKS WITH PEOPLE AND TEAMS Q A. ABSOLUTELY. EVERY SINGLE DAY AND THEY'RE CONSTANTLY 10 Q. AND TEACH OTHERS TO DO THE 10 COMMUNICATING AND WHATEVER SITUATION 11 SAME? 11 ARISES YOU'RE ABLE TO HANDLE THAT QUICKLY 12 A. YES. 12 INSTEAD OF, YOU KNOW, BEHIND AN OFFICE 13 Q. HOW DO YOU DETERMINE WHETHER 13 DOOR. 14 SOMEBODY HAS THOSE ABILITIES? 14 Q. DOES IT MAKE A DIFFERENCE 1.5 A. THEIR PAST PERFORMANCE IS 15 WHAT INDUSTRY THE PERSON, IF THAT'S WHAT 16 MANY TIMES AN EXCELLENT INDICATOR OF 16 YOU'RE ASSESSING, THAT SORT OF 17 THAT. 17 FACE-TO-FACE LEADERSHIP TYPE MANAGEMENT, 18 Q. AND WHAT DO YOU LOOK AT IN 18 THAT SORT OF DAILY INTERACTION, DOES IT 19 TERMS OF THEIR PAST PERFORMANCE? 19 MAKE A DIFFERENT WHAT INDUSTRY THE PERSON 20 A. I LOOK FOR TEAM BUILDING, 20 HAS MANAGEMENT EXPERIENCE IN? 21 TELL ME ABOUT YOUR TEAM, HOW WOULD YOU 21 A. LIKE I SAID, NOT NECESSARILY 22 MOTIVATE YOUR TEAM. IF I WERE TO CALL 22 BUT IF IT'S SOMETHING THAT'S VERY 23 THEM RIGHT NOW WHAT WOULD THEY TELL ME 23 TECHNICAL SOMETHING THAT'S ABSOLUTELY NOT 24 ABOUT YOU. IF I WERE TO CALL YOUR 24 RELEVANT TO WHAT WE DO, I MEAN THAT -- I Page 203 Page 205 SUPERVISORS WHAT WOULD THEY TELL ME ABOUT 1 MEAN IF YOU HAVE A POOL OF APPLICANTS I YOU. I ALSO LOOK TO SEE IF THE PERSON MEAN IF YOU WERE DECIDING ON WHO IS MAYBE WAS PROMOTED WITHIN THEIR PAST JOBS 3 COMING IN, SURE, IF SOMETHING WAS TOTALLY BECAUSE OBVIOUSLY THAT SHOWS LEADERSHIP. 4 IRRELEVANT AND YOU HAVE A LOT OF RELEVANT 5 Q. ANYTHING ELSE? I THINK YOU WOULD GO WITH THE ONE THAT'S 6 A. I THINK THAT'S IT. RELEVANT TO WHAT YOU DO. 7 Q. WHEN YOU'RE LOOKING AT THE 7 Q. ARE THE RELEVANT THINGS THE PERSON'S -- CAN YOU ASSESS ANY OF THESE 8 THINGS THAT YOU JUST MENTIONED EARLIER? THINGS FROM LOOKING AT A PERSON'S RESUME 9 A. THOSE ARE THE ONES THAT ARE 10 OR JOB APPLICATION? -- I MEAN I PREFER THOSE BECAUSE IT'S 11 A. SOMETIMES, YES. SOMETHING THAT'S A QUICK, NATURAL, JUMP 12 Q. WHAT IS THAT YOU LOOK TO ON BUT IT'S NOT, IT'S NOT AN INDICATOR, LIKE THE APPLICATION OR RESUME TO MAKE THAT I SAID, WE DON'T HIRE BASED ON MINIMUM 14 ASSESSMENT? 14 REQUIREMENTS. 15 A. MANY TIMES PEOPLE MIGHT HAVE 15 Q. IN YOUR EXPERIENCE THE 16 MANAGEMENT EXPERIENCE BUT IT MIGHT BE A THINGS THAT YOU'RE LOOKING FOR IN A 17 CLOSED DOOR MANAGEMENT, WHAT I MEAN BY CENTER MANAGER, I MEAN, ARE YOU ABLE TO 18 THAT IS THEY MAY WORK IN THEIR OFFICE. MAKE THAT DETERMINATION SOLELY FROM 19 WORK ON THEIR COMPUTER, OCCASIONALLY HAVE LOOKING AT THE PAPER, THE APPLICATION AND

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THE RESUME? I MEAN OBVIOUSLY YOU CAN

TELL IF SOMEONE'S HAD MANAGEMENT

IT'S ON THE PAPER.

EXPERIENCE OR NOT?

A. RIGHT.

23

24

20 CONTACT MAYBE VIA ON THE PHONE WITH

21 SOMEONE, THAT'S NOT THE CONTACT I'M

Q. TECHNICAL PUBLICATION.

22 LOOKING FOR. I'M NOT LOOKING FOR

23 SOMEBODY WHO IS A MANAGER OF -

24